

# **Exhibit 1**

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9 Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA

12 SAN FRANCISCO DIVISION

13 WAYMO LLC,

14 Plaintiff,

15 vs.

16 UBER TECHNOLOGIES, INC.;  
17 OTTOMOTTO LLC; OTTO TRUCKING  
LLC,

18 Defendants.

CASE NO. 3:17-cv-00939

**PLAINTIFF WAYMO LLC'S THIRD  
AMENDED RULE 26(a)(3) WITNESS  
LIST**

Plaintiff Waymo LLC (“Waymo”) hereby provides its third amended witness list pursuant to Fed. R. Civ. P., 26(a)(3) and paragraphs 1 and 2(a) of the Guidelines for Trial and Final Pre-Trial Conference in Civil Jury Cases Before the Honorable William Alsup.

Waymo identifies the name and, if not previously provided, the address, telephone number, and anticipated testimony of each witness it may present at trial other than solely for impeachment — separately identifying those the party expects to present and those it may call if the need arises. Waymo further reserves the right to call any witness on any of Defendant's witness lists, further including any of the witnesses identified by Defendants or Waymo on any subjects identified by either Defendants or Waymo.<sup>1</sup>

**I. WITNESSES WAYMO WILL PRESENT AT TRIAL**

Name	Contact Information	Substance of Testimony
Prabir Adarkar	May be reached through counsel for Uber	Mr. Adarkar may be asked to provide non-cumulative testimony regarding Uber’s financial forecasts for autonomous vehicles, and Uber’s competitive relationship with Waymo, including its willingness to cut prices to compete with Waymo.
Shawn Bananzadeh	May be reached through counsel for Waymo	Mr. Bananzadeh will provide non-cumulative testimony regarding costs of development of, and management of Waymo’s self-driving cars and autonomous vehicle technology. Waymo further identifies the subjects of the Rule 30(b)(6) topic(s) for which he was designated as Waymo's corporate witness.
John Bares	May be reached through counsel for Uber	Mr. Bares will be asked to provide non-cumulative testimony concerning Defendants misappropriation of Waymo’s trade secrets, including their acquisition, use and disclosure, and the lack of independent development; acquisition of Otto; and Mr. Levandowski's employment milestones.

<sup>1</sup> Waymo's list includes witnesses who may be offered in rebuttal.

1	Gary Brown	May be reached through counsel for Waymo	Mr. Brown will provide non-cumulative testimony concerning Google/Waymo's forensic investigation into misappropriation of trade secrets, particularly analysis of log data and hardware; Google/Waymo's reasonable efforts to maintain the secrecy of its electronic systems, digital document storage repositories, and computer networks, including but not limited to the SVN server. Waymo further identifies the subjects of the Rule 30(b)(6) topic(s) for which he was designated as Waymo's corporate witness.
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9	Scott Boehmke	May be reached through counsel for Uber	Mr. Boehmke will provide non- cumulative testimony concerning Defendants misappropriation of Waymo's trade secrets, including their acquisition, use and disclosure, and the lack of independent development.
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13	Dan Chu	May be reached through counsel for Waymo	Mr. Chu will provide non-cumulative testimony regarding matters that concern Waymo, including investment in, development of, and management of Waymo's self-driving cars and autonomous vehicle technology; the current and future nature of the relevant markets and competition in the relevant markets, and other issues related to irreparable harm and damages suffered by Waymo, Waymo's short-term and long- term business plans, Waymo's early rider program in Phoenix, Waymo's launch of its TaaS service, and Waymo's understanding of the TaaS market (including competition in that market and Waymo's competitive advantages). Waymo further identifies the subjects of the Rule 30(b)(6) topic(s) for which he was designated as Waymo's corporate witness.
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24	Andy Crain	May be reached through counsel for Waymo	Mr. Crain will provide expert testimony pertaining to forensic analysis of the devices the Diligenced Employees provided to Stroz Friedberg, including flaws in the Stroz due diligence process; devices not provided to Stroz; device connections and activity on Levandowski's MacBook computer; and browser history and download history on
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1			Levandowski's MacBook computer.
2	Dmitri Dolgov	May be reached through counsel for Waymo	Dr. Dolgov will provide non-cumulative testimony regarding the development of Waymo's self-driving car technology, including its LIDAR designs and associated self-driving vehicle software development; the development of certain of Waymo's trade secrets, Waymo's engineering practices, and the Chauffeur Bonus Plan. Waymo further identifies the subjects of the Rule 30(b)(6) topic(s) for which he was designated as Waymo's corporate witness.
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9	Pierre-Yves Droz	May be reached through counsel for Waymo	Mr. Droz will provide non-cumulative testimony regarding the development of Waymo's self-driving car technology, including its LIDAR designs and the development of Waymo's trade secrets, time to develop Waymo's LIDAR designs and trade secrets, engineering practices of Waymo and the LIDAR team regarding the confidentiality of its designs and measures to keep them secret, the contents of Waymo's SVN server, and communications with Anthony Levandowski regarding Uber and formation of Otto. Waymo further identifies the subjects of Mr. Droz's prior declarations submitted in this matter, Dkt. 25-31, 453-3 as subject he may testify about as well as the Rule 30(b)(6) topics for which he was designated as Waymo's corporate witness.
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21	Eric Friedberg	May be reached through counsel for Stroz Friedberg:  Melanie Blunschi  Latham & Watkins  505 Montgomery Street, Suite 2000  San Francisco, CA 94111-6538  Direct Dial: +1.415.395.8129	Mr. Friedberg will be asked to provide non-cumulative testimony regarding the Stroz due diligence analysis, investigation, and report, and the Uber- Otto acquisition; Defendants' misappropriation of Waymo's trade secrets, including their acquisition, use and disclosure.
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1		Email: <a href="mailto:melanie.blunsch@lw.com">melanie.blunsch@lw.com</a>	
2	John Gardner	May be reached through counsel:  Merri Baldin  Rogers Joseph O'Donnell  311 California Street, 10th fl   San Francisco, CA 94104 415.956.2828 main   <a href="mailto:mbaldwin@rjo.com">mbaldwin@rjo.com</a>	Mr. Gardner will be asked to provide non-cumulative testimony regarding Ottomotto and Otto Trucking; the Uber-Otto acquisition; Mr. Levandowski's businesses; the Stroz due diligence analysis, investigation, and report; the misappropriation of Waymo trade secrets; destruction of relevant evidence; and Tyto LiDAR.
3	William Grossman	May be reached through counsel for Waymo	Mr. Grossman will provide non-cumulative testimony regarding Waymo's accidental receipt of an email containing an Otto LiDAR PCB.
4	Dan Gruver	May be reached through counsel for Uber	Mr. Gruver will be asked to provide non-cumulative testimony regarding Defendants' misappropriation of Waymo's trade secrets, including their acquisition, use and disclosure, and the lack of independent development; and the development of Waymo's self-driving car technology, including its LIDAR designs.
5	Mary Fulginiti	May be reached through counsel for Stroz Friedberg	Ms. Fulginiti will be asked to provide non-cumulative testimony regarding the Stroz due diligence analysis, investigation, and report.
6	Bill Gurley	May be reached through counsel:  Martin Flumenbaum  1285 Avenue of the Americas  New York, NY 10019  (212) 373-3191  <a href="mailto:mflumenbaum@paulweiss.com">mflumenbaum@paulweiss.com</a>	Mr. Gurley will be asked to provide non-cumulative testimony regarding Uber's acquisition of Otto; board meetings, discussions, and knowledge concerning the Otto acquisition including Mr. Kalanick and others' representations; facts surrounding Mr. Kalanick and board discussions concerning his termination; negotiations with Mr. Kalanick concerning the Otto acquisition and his resignation; Stroz due diligence report; and representations made by Mr. Kalanick regarding the Stroz report and Otto acquisition; and Benchmark's claim that Mr. Kalanick committed fraud and breached his fiduciary duty with respect to the Otto acquisition.

1	James Haslim	May be reached through counsel for Uber	Mr. Haslim will be asked to provide non-cumulative testimony regarding
2			Defendants misappropriation of Waymo's
3			trade secrets (including but not limited to
4			through Tyto LIDAR), including their
5	Lambertus	May be reached through	acquisition, use and disclosure, and the
6	Hesselink	counsel for Waymo	lack of independent development.
7			Professor Hesselink will provide expert
8			testimony pertaining to optics as it relates
9			to a LiDAR system for a self-driving
10			vehicle; general optics and LiDAR
11			principles, background state of the art;
12			explain Waymo's disclosed trade secrets
13			relating to LiDAR optical systems and
14			components and is expected to provide
15			opinions regarding the level of skill and
16			effort required to derive such trade secrets
17			based on the available evidence in this
18			case. Retained Prof. Hesselink is expected
19			to also opine that Waymo's LiDAR
20			systems embody certain of Waymo's
21			disclosed trade secrets.
22			Prof. Hesselink is expected to further
23			offer opinions that (i) Waymo undertook
24			reasonable efforts to maintain certain
25			disclosed trade secrets in relative secrecy;
26			(ii) such trade secrets are not generally
27	Jeff Holden	May be reached through	known by individuals within the relevant
28		counsel for Uber	filed and/or are not readily ascertainable;
			and (iii) such trade secrets derive
			independent economic value by virtue of
			their not being generally known in the
			relevant field. Additionally, Prof.
			Hesselink is expected to opine regarding
			Defendants' misappropriation of certain
			of Waymo's disclosed trade secrets based
			on (i) contemporaneous technical
			evidence reflecting Defendants'
			acquisition, use, and/or disclosure of
			Waymo's disclosed trade secret concepts;
			(ii) the similarity of Defendants'
			technology to Waymo's disclosed trade
			secrets and/or Waymo's implementation
			of such trade secrets in Waymo's
			commercial products; and/or (iii) the lack
			of evidence supporting Defendants'
			independent development of their own
			technology.
			Mr. Holden will be asked to provide non-
			cumulative testimony regarding the state
			of Uber's autonomous vehicle program
			before the Otto acquisition; negotiations

1			with Mr. Levandowski regarding the acquisition; Mr. Levandowski's consulting work; facts surrounding Mr. Levandowski's continued employment with Uber and termination; and Defendants' misappropriation of Waymo's trade secrets.
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5	Michael Janosko	May be reached through counsel for Waymo	Mr. Janosko will provide non-cumulative testimony regarding reasonable measures to protect security at Google and Waymo, including Google's enterprise infrastructure.
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8	Travis Kalanick	May be reached through counsel:	Mr. Kalanick will be asked to provide non-cumulative testimony regarding Uber's driverless car program; Uber's solicitation of Google and Waymo employees; discussions with, knowledge about, Levandowski, discussions with the Board and Benchmark partners concerning the Otto acquisition, Mr. Levandowski, and the relationship between the facts surrounding this case and his termination; negotiations with Mr. Levandowski regarding the founding of Ottomotto and Otto Trucking, and Otto acquisition; the Uber-Otto acquisition; solicitation of Google/Waymo employees; the Stroz due diligence analysis, investigation, and report; Uber's knowledge of stolen documents, understanding, and activity related to misappropriation of Google/Waymo trade secret and proprietary information; Levandowski's employment and continued employment at Uber; and destruction of relevant evidence.
9		Melinda Haag	
10		Orrick	
11		405 Howard Street	
12		San Francisco, CA 94105-2669	
13		+1 415 773 5495	
14		<a href="mailto:mhaag@orrick.com">mhaag@orrick.com</a>	
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21	Anthony	May be reached through counsel:	Mr. Levandowski will be asked to provide non-cumulative testimony regarding the development of Waymo's self-driving car technology, including its LIDAR designs and the development of Waymo's trade secrets, engineering practices of Waymo and the LIDAR team regarding the confidentiality of its designs and measures to keep them secret, his performance at Waymo, the contents of Waymo's SVN server, and communications with Google employees regarding Uber and formation of Otto; Uber's driverless car program; Uber's solicitation of Google and Waymo employees; the relationship between the
22	Levandowski	Miles Erlich	
23		Ramsey & Ehrlich LLP	
24		803 Hearst Avenue	
25		Berkeley, CA 94710	
26		Tel: (510) 548-3600	
27		<a href="mailto:miles@ramsey-ehrllich.com">miles@ramsey-ehrllich.com</a>	
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1			facts surrounding this case and his termination; negotiations regarding the founding of Ottomotto and Otto Trucking, and Otto acquisition; the Uber-Otto acquisition; the Stroz due diligence analysis, investigation, and report; Uber's knowledge of stolen documents, understanding, and activity related to misappropriation of Google/Waymo trade secret and proprietary information; Levandowski's employment and continued employment at Uber; and destruction of relevant evidence. Waymo further identifies those subjects identified in Waymo's Statement Regarding Questions it Intends to Ask Anthony Levandowski at Trial. Dkt. 835.
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10	John Krafcik	May be reached through counsel for Waymo	Mr. Krafcik will provide non-cumulative testimony regarding Waymo's business; Anthony Levandowski, and his departure from Google; the relationship between Waymo and Google; and Waymo's development of its TaaS service, and valuations of Chauffeur.
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14	Melanie Maugeri	May be reached through counsel for Stroz Friedberg	Ms. Maugeri will be asked to provide non-cumulative testimony regarding the Stroz due diligence analysis, investigation, and report.
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17	Brian McClendon	May be reached through counsel for Uber	Mr. McClendon will be asked to provide non-cumulative testimony regarding solicitation of and negotiations with Levandowski regarding founding Ottomotto and Otto Trucking; and the Uber-Otto acquisition, the development of Uber's self-driving technology, including before the Otto acquisition, Defendants' misappropriation of Waymo's trade secrets, including their acquisition, use and disclosure, and the lack of independent development.
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23	Angela Padilla	May be reached through counsel for Uber	Ms. Padilla will be asked to provide non-cumulative testimony regarding the Stroz due diligence analysis, investigation, and report; Levandowski's employment and continued employment at Uber; the relationship between the facts surrounding this case and his termination; and the Uber-Otto acquisition, Defendants' misappropriation of Waymo's trade secrets, including their acquisition, use and disclosure, and the
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1			lack of independent development, destruction of relevant evidence.
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3	Gaetan Pennecot	May be reached through counsel for Uber	Mr. Pennecot will be asked to provide non-cumulative testimony regarding Defendants' misappropriation of
4			Waymo's trade secrets, including their acquisition, use and disclosure, and the
5			lack of independent development; the development of Waymo's self-driving car
6			technology, including its LIDAR designs.
7	Cameron Poetzcher	May be reached through counsel for Uber	Mr. Poetzcher will be asked to provide non-cumulative testimony regarding
8			Uber's negotiations with Mr. Levandowski regarding the formation of
9			Ottomotto/Otto Trucking; and the acquisition; solicitation of
10			Google/Waymo employees; destruction of relevant evidence; and the Stroz due
11			diligence analysis, investigation, and report.
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13	Nina Qi	May be reached through counsel for Uber	Ms. Qi will be asked to provide non-cumulative testimony regarding Uber's
14			decision to acquire Ottomotto (and to enter into an option to acquire Otto
15			Trucking); contacts between Uber and Mr. Levandowski regarding the formation
16			of Ottomotto / Otto Trucking, Uber's acquisition of those entities, and the
17			benefits that Uber would obtain via those acquisitions; Uber's solicitation of
18			Google/Waymo employees; Uber's internal views on those subjects,
19			destruction of relevant evidence; and the Stroz due diligence analysis,
20			investigation, and report.
21	Lior Ron	May be reached through counsel:	Mr. Ron will be asked to provide non-cumulative testimony regarding the
22		Taylor & Patchen, LLP	misappropriation of Waymo trade secrets; founding of Ottomotto and Otto
23		One Ferry Building, Suite 355	Trucking; the Uber-Otto acquisition; the Stroz due diligence analysis,
24		San Francisco, CA 94111	investigation, and report; and the business and product development of Ottomotto
25		T: (415) 788-8200	and Otto Trucking, destruction of relevant evidence.
26	Justin Suhr	May be reached through counsel for Uber	Mr. Suhr will be asked to provide non-cumulative testimony regarding the Stroz
27			due diligence analysis, investigation, and report.
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1	Eric Tate	May be reached through counsel for MoFo	Mr. Tate will be asked to provide non-cumulative testimony regarding the Uber-Otto acquisition; the Stroz due diligence analysis, investigation, and report; and destruction of relevant evidence.
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4	Jim Timmins	May be reached through counsel for Waymo	Mr. Timmins will provide expert testimony regarding customary practices with respect to M&A transactions (including regarding indemnification) and the consideration paid by Uber to acquire Ottomotto (including relative to other acquisitions).
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8	Salle Yoo	May be reached through counsel for Uber	Ms. Yoo will be asked to provide non-cumulative testimony regarding the Uber-Otto acquisition; the Stroz due diligence analysis investigation, and report; continued employment and termination of Anthony Levandowski; and Defendants misappropriation of Waymo's trade secrets, destruction of relevant evidence.
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13	Sasha Zbrozek	May be reached through counsel for Waymo	Mr. Zbrozek will provide non-cumulative testimony concerning Google/Waymo's forensic investigation, particularly the SVN server and related log data, including Mr. Levandowski's download of the 14,000 files from the SVN server; Google/Waymo's reasonable efforts to maintain the secrecy of its electronic systems, digital document storage repositories, and computer networks
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19 **II. WITNESSES WAYMO MAY PRESENT AT TRIAL IF THE NEED ARISES**

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21	<b>Name</b>	<b>Contact Information</b>	<b>Substance of Testimony</b>
22	Chelsea Bailey	May be reached through counsel for Waymo	Ms. Bailey will provide non-cumulative testimony regarding the Chauffeur Bonus Plan; Mr. Levandowski's departure from Google, including Google's collection of Levandowski's laptops and delivery of those laptops to the Google forensics team; and Mr. Levandowski's performance as a Google/Waymo employee
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1	Travis Bellanger	May be reached through counsel for Waymo	Mr. Bellanger will provide non-cumulative testimony concerning Google/Waymo's forensic investigation into the activities of Anthony Levandowski, including Google's collection of Levandowski's laptops and delivery of those laptops to the Google forensics team
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7	Adam Bentley	May be reached through counsel for Uber	Mr. Bentley will be asked to provide non-cumulative testimony regarding the Uber- Otto acquisition; the Stroz due diligence analysis, investigation, and report; and destruction of relevant evidence.
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11	Matthew Blattmachr	Bismuth Trust; May be reached through counsel:  Diane F. Vallentine  Jermain, Dunnagan & Owens, PC  3000 A Street, Suite 300  Anchorage, AK 99503	Mr. Battmachr will be asked to provide non-cumulative testimony regarding the ownership of Levandowski's companies
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19	Don Burnette	May be reached through counsel for Uber	Mr. Burnette will be asked to provide non-cumulative testimony concerning Defendants misappropriation of Waymo's trade secrets, including their acquisition, use and disclosure, and the lack of independent development; the development of Waymo's self- driving car technology, including its LIDAR designs and planner software; due diligence by Stroz for Otto acquisition by Uber; and destruction of relevant evidence.
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27	Neel Chatterjee	May be reached through counsel for Otto Trucking	Mr. Chatterjee will be asked to provide non-cumulative testimony regarding Goodwin
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1			Procter's possession of misappropriated materials; destruction of relevant evidence; chain of custody of Anthony Levandowski's personal laptops, and searches thereof.
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5	Hanley Chew	May be reached through counsel for Stroz Friedberg	Mr. Chew will be asked to provide non-cumulative testimony regarding the Stroz due diligence analysis, investigation, and report.
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8	Gerard Dwyer	May be reached through counsel for Waymo	Mr. Dwyer will provide non-cumulative testimony regarding inputs to Waymo's current P&L. He may also provide testimony regarding Waymo's current business plan.
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12	Paul French	May be reached through counsel for Waymo	Rebuttal of expert testimony of Kevin Faulkner, including opinions related to the various flaws and errors in Stroz's search for Waymo confidential information at Uber; rebuttal of expert testimony of Erik Laykin, including opinions related to the Waymo forensic investigation, Anthony Levandowski's download of the 14,000 files, Radu Raduta's download of confidential documents from Google Drive and Sameer Kshirsagar's download of confidential documents from Google Drive
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22	Arturo Gonzalez	MoFo; May be reached through counsel for Uber	Mr. Gonzalez will be asked to provide non-cumulative testimony regarding MoFo's possession of misappropriated materials; destruction of relevant evidence; and Defendants' knowledge of same. As Waymo previously advised Uber, Waymo does not intend to call Mr. González as a witness unless Defendants open the door by claiming that they complied with their
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1			discovery obligations.
2	Kristin Gunjonsson	May be reached through	Mr. Gudjonsson will provide
3		counsel for Waymo	non-cumulative testimony
4			concerning Google/Waymo's
5			forensic investigation into
6			misappropriation of trade
7			secrets, particularly analysis of
8			hardware; Google/Waymo's
9			reasonable efforts to maintain
10	Gataum Gupta	May be reached through	the secrecy of its electronic
11		counsel for Uber	systems, digital document
12			storage repositories, and
13			computer networks, including
14			but not limited to the SVN
15			server
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18	Bruce Hartley	May be reached through	Mr. Gupta will be asked to
19		counsel for Waymo	provide non-cumulative
20			testimony regarding Uber's
21			acquisition of Ottomotto and
22			Uber's funding of Otto
23			Trucking's business activities.
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1			the 409(a) valuation conducted when Waymo was spun off from Google. Ms. Haroon may also provide testimony regarding the evolution of Waymo's business plan over time. Waymo further identifies the subjects of the Rule 30(b)(6) topic(s) for which she was designated as Waymo's corporate witness.
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8	Ben Ingram	May be reached through counsel for Waymo	Mr. Ingram will provide non-cumulative testimony regarding the development of Waymo's self-driving car technology, including its LIDAR designs and associated self-driving vehicle software development; the development of certain of Waymo's trade secrets.
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13	Soren Juelsgaard	May be reached through counsel for Uber	Mr. Juelsgaard will be asked to provide non-cumulative testimony concerning Defendants misappropriation of Waymo's trade secrets, including their acquisition, use and disclosure, and the lack of independent development; the development of Waymo's self-driving car technology, including its LIDAR designs and software; due diligence by Stroz for Otto acquisition by Uber; and destruction of relevant evidence.
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21	Rudy Kim	MoFo	Mr. Kim will be asked to provide non-cumulative testimony regarding the Uber-Otto acquisition; the Stroz due diligence analysis, investigation, and report; and destruction of relevant evidence.
22		May be reached through counsel for Uber	
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26	Asheem Linaval	May be reached through counsel for Uber	Mr. Linaval will be asked to provide non-cumulative testimony concerning Defendants misappropriation of Waymo's trade secrets, including their acquisition, use
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1			and disclosure, and the lack of independent development; the development of Waymo's self-driving car technology, including its LIDAR designs.
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4	David Lawee	May be reached through counsel for Waymo	Mr. Lawee will provide non-cumulative testimony regarding Google's mergers and acquisitions, including the negotiation and drafting of Google's merger and acquisition agreements, the process of conducting valuations, Waymo's valuations, and the Chauffeur Bonus Plan. Waymo further identifies the subjects of the Rule 30(b)(6) topic(s) for which he was designated as Waymo's corporate witness.
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12	Max Levandowski	May be reached through counsel for Uber	Mr. Levandowski will be asked to provide non-cumulative testimony concerning Defendants misappropriation of Waymo's trade secrets, including their acquisition, use and disclosure, and the lack of independent development; the development of Waymo's self-driving car technology, including its LIDAR designs.
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19	Emil Michael	May be reached through counsel:	Mr. Michael will be asked to provide non-cumulative testimony regarding the negotiations with Levandowski regarding founding Ottomotto and Otto Trucking; the Uber-Otto acquisition; Levandowski's employment and continued employment at Uber; discussions with, knowledge about, Levandowski, discussions with the Board and Benchmark partners concerning the Otto acquisition, Mr. Levandowski, and the relationship between the facts surrounding this case and his termination.
20		Margaret Tough	
21		Latham & Watkins	
22		505 Montgomery Street	
23		Suite 2000	
24		San Francisco, CA 94111	
25		(415) 391-0600	
26		<a href="mailto:margaret.tough@lw.com">margaret.tough@lw.com</a>	
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1	Rhian Morgan	May be reached through counsel for Uber	Ms. Morgan will be asked to provide non-cumulative testimony regarding the founding and business of Ottomotto and Otto Trucking; Uber's acquisition of Otto; and the Stroz due diligence analysis, investigation, report; Defendants misappropriation of Waymo's trade secrets, destruction of relevant evidence.
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8	Daniel Ratner	May be reached through counsel for Uber	Mr. Ratner will be asked to provide non-cumulative testimony concerning Defendants misappropriation of Waymo's trade secrets, including their acquisition, use and disclosure, and the lack of independent development; the development of Waymo's self- driving car technology, including its LIDAR designs.
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14	Bryan Salesky	May be contacted through counsel:	Mr. Salesky will provide non- cumulative testimony regarding the history of Google/Waymo's self-driving- car development efforts; Mr. Levandowski's performance as a Google/Waymo employee; certain of Mr. Levandowski's communications with Uber prior to his departure from Google/Waymo
15		Stacy North	
16		Pierce & Shearer LLP	
17		<a href="mailto:snorth@pierceshearer.com">snorth@pierceshearer.com</a>	
18		650-843-1900	
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20	Brent Schwarz	May be reached through counsel for Uber	Mr. Schwarz will be asked to provide non-cumulative testimony regarding Defendants misappropriation of Waymo's trade secrets, including their acquisition, use and disclosure, and the lack of independent development; regarding Tyto LiDAR and Otto's acquisition of Tyto.
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26	Colin Sebern	May be reached through counsel for Uber	Mr. Sebern will be asked to provide non-cumulative testimony concerning Defendants misappropriation of Waymo's trade secrets, including their acquisition, use
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1			and disclosure, and the lack of independent development; the development of Waymo's self-driving car technology, including its LIDAR designs and software; due diligence by Stroz for Otto acquisition by Uber.
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6	Ognen Stojanovski	May be reached through counsel for Uber	Mr. Stojanovski will be asked to provide non-cumulative testimony regarding Defendants misappropriation of Waymo's trade secrets, including their acquisition, use and disclosure, and the lack of independent development; regarding Tyto LiDAR and Otto's acquisition of Tyto; regarding communications with Mr. Levandowski regarding Tyto LIDAR and other businesses related to Mr. Levandowski.
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14	Chris Urmson	May be reached through counsel:	Mr. Urmson will provide non-cumulative testimony regarding the history and development of Waymo's self-driving car technology, including its LIDAR designs; Mr. Levandowski's performance at Google and circumstances surrounding his termination from Google; Chauffeur Bonus Plan; Waymo valuation(s).
15		Benjamin L. Singer	
16		601 Montgomery St.	
17		Suite 1950	
18		San Francisco, CA 94111	
19		<u>415-500-6080</u>	
20	Tim Willis	May be reached through counsel for Waymo	Mr. Willis will provide non-cumulative testimony regarding Waymo's supply chain operation, including reasonable steps taken to protect confidential and proprietary information shared with suppliers.
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### III. WITNESSES WHO MAY TESTIFY BY DEPOSITION

The following witnesses may testify by deposition:

Anthony Levandowski

1 Travis Kalanick  
2 Nina Qi  
3 Bill Gurley  
4 Jeff Holden  
5 John Bares  
6 Gaetan Pennecot  
7 Dan Gruver  
8 James Haslim  
9 Cameron Poetzcher  
10 Scott Boehmke  
11 Lior Ron  
12 Adam Bentley  
13 Rhian Morgan  
14 Don Burnette  
15 Soren Julesgaard  
16 Ognen Stojanovski  
17 Salle Yoo  
18 Gataum Gupta  
19 Emil Michael  
20 Asheem Lineval  
21 Colin Sebern  
22 Brent Schwarz  
23 Angela Padilla  
24 Justin Suhr  
25 Eric Tate  
26 Rudy Kim  
27 John Gardner  
28 Chris Urmson

1 Brian McClendon

2 Bryan Salesky

3 Eric Friedberg

4 Hanley Chew

5 Mary Fulginiti

6 Melanie Maugeri

7  
8 DATED: November 15, 2017

QUINN EMANUEL URQUHART & SULLIVAN,  
LLP

9  
10 By /s/ Charles K. Verhoeven

11 Charles K. Verhoeven  
12 Attorneys for WAYMO LLC  
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